

1. On November 2, 2016, DAVID TANG (“Plaintiff”) filed an action (“Action”) in the Circuit Court of Cook County, Illinois, against SOUTHEAST DIRECTIONAL DRILLING, LLC, a PLH GROUP COMPANY and ZACHARY DAHL (“Defendants”) with the docket number 2016 L 010795. Plaintiff’s Complaint at Law attached as Exhibit A.
2. SOUTHEAST DIRECTIONAL DRILLING, LLC was served on November 8, 2016. Service of Process Notices attached as Exhibit B.
3. Upon information and belief, ZACHARY DAHL has not been served as of the date of this filing.

4. Upon information and belief, ZACHARY DAHL is not a citizen of the State of Illinois.

5. Defendant filed its Notice of Removal within the thirty (30) day time period required by 28 U.S.C § 1446.

**Basis for Removal**

6. Under 28 U.S.C §1332 (c) (1), a corporation is deemed to be a citizen of any state in which it has been incorporated and of the state in which it has its principal place of business.

7. PLH GROUP, INC. is a corporation organized under the laws of the State of Delaware with its principal place of business in the State of Texas.

8. SOUTHEAST DIRECTIONAL DRILLING, LLC is a wholly owned domestic subsidiary of PLH GROUP, INC. incorporated under the laws of the State of Minnesota with its principal place of business in the State of Arizona.

9. Upon information and belief, Plaintiff is a citizen of the State of Illinois, domiciled in Cook County, Illinois.

10. In accordance with the Illinois Code of Civil Procedure, Plaintiff does not have to specifically quantify the amount of damages he seeks in the Action; furthermore, Plaintiff has not made any such specific quantification of damages in his pleadings.

11. Plaintiff's Action alleges continuing injuries of a personal, pecuniary, and permanent nature.

12. Based upon information from an Illinois Crash Report, Plaintiff was allegedly ejected from his vehicle and transported by the Elk Grove Fire Department to Advocate Lutheran General Hospital.

13. Based upon medical information disclosed to Defendant's insurer, Plaintiff was reportedly treated at Lutheran General Hospital in critical condition.

14. Based upon medical information disclosed to Defendant's insurer, Plaintiff allegedly suffered a lacerated kidney, deep vein thrombosis, pulmonary embolism, aggravation of a pre-existing cardiac condition that caused concerns, broken ribs, collapsed lungs, and other minor injuries.

15. Based on medical billing information disclosed to Defendant's insurer, Plaintiff's medical specials incurred to date allegedly exceed \$177,082.00.

16. This Court has original jurisdiction under 28 U.S.C. §1332 because the matter in controversy in the Action exceeds the sum of \$75,000.00 and is between citizens of different States.

17. This matter is properly removed pursuant to 28 U.S.C. § 1441 because this Court has original jurisdiction.

18. Venue is proper in the Northern District, Eastern Division of this Court under 28 U.S.C. § 1446 as this is the district which encompasses the Circuit Court in which the Action was filed and is pending.

19. Defendant desires a trial by jury in this Court.

20. Defendant shall promptly file a copy of this Notice of Removal with the Circuit Court Clerk for the County of Cook, State of Illinois. Exhibit C.

THEREFORE, Defendant, SOUTHEAST DIRECTIONAL DRILLING, LLC a PLH GROUP COMPANY, respectfully requests that this matter be removed from the Circuit Court of

Cook County, State of Illinois, to the United States District Court, Northern District of Illinois,  
Eastern Division.

Dated: December 22, 2016

Respectfully submitted,

/s/John W. Patton, Jr.

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